

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DARNELL E. WILLIAMS and YESSANIA M.
TAVERAS,

Plaintiffs,

v.

ELISABETH DEVOS, in her official capacity as
Secretary of the United States Department of Education,

Defendant.

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) C.A. No. 16-11949-LTS
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ASSENTED-TO MOTION TO FILE UNDER SEAL

Pursuant to the Court’s Order dated November 17, 2017 (Document No. 44), Defendant, Elisabeth DeVos, Secretary of the U.S. Department of Education, by and through her attorney, William D. Weinreb, Acting United States Attorney for the District of Massachusetts, has filed her Opposition to Plaintiffs’ Motion to Supplement the Administrative Record and Permit Limited Discovery (Document No. 50) and the accompanying Second Declaration of Chad Keller (Exhibit 1, Document No. 50-1) (“Second Keller Declaration”). To the extent that the Second Keller Declaration include descriptions of the contents of the so-called “DTR Application” filed under seal pursuant to this Court’s Order dated December 7, 2017 (Document No. 49), those portions of the declaration were redacted prior to public filing *via* CM/ECF. Defendant respectfully requests that the Court allow this motion to file the un-redacted Second Keller Declaration in paper and under seal pursuant to the Protective Order in this case (Document No. 40). Plaintiffs assent to this request.

WHEREFORE, Defendant respectfully requests that the Court allow this motion to file the Second Keller Declaration (Document No. 50-1) in un-redacted form in paper and under seal.

Respectfully submitted,

WILLIAM D. WEINREB,
Acting United States Attorney

By: /s/ Jessica P. Driscoll
Jessica P. Driscoll, BBO No. 655394
Assistant United States Attorney
United States Attorney's Office
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3398
Jessica.Driscoll@usdoj.gov

Dated: December 15, 2017

Local Rule 7.1 Certificate

I hereby certify that I contacted Plaintiffs' attorneys, Alec Harris, who indicated that Plaintiffs assent to the relief requested in this motion.

/s/ Jessica P. Driscoll
Jessica P. Driscoll
Assistant United States Attorney

Dated: December 15, 2017

CERTIFICATE OF SERVICE

I, Jessica P. Driscoll, Assistant United States Attorney, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants by First Class Mail.

/s/ Jessica P. Driscoll
Jessica P. Driscoll
Assistant United States Attorney

Dated: December 15, 2017